



# Modern Slavery Statement

2024



# Mandatory reporting criteria of the Modern Slavery Act

This Statement was prepared to meet the mandatory reporting criteria set out under the Australian Modern Slavery Act 2018 (Cth). The table below identifies where each criterion of the Act is disclosed within sections of this Statement.

MSA CRITERIA	SECTION IN THIS STATEMENT
Identify the reporting entity	<b>1. Message from the Board and Executive Summary</b>
Describe the reporting entity's structure, operations and supply chains	<b>2. About Contact</b>
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	<b>3. Risks of modern slavery practices in our operations and supply chain section</b>
Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address those risks, including due diligence and remediation processes	<b>4. Actions to address identified risks</b>
Describe how the reporting entity assesses the effectiveness of these actions	<b>5. Effectiveness of our Actions</b>
Describe the process of consultation with any entities that the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	<b>6. Consultation and Approval Process</b>

# 1. Message from the Board

Contact Energy is committed to creating a sustainable energy future for New Zealand and putting our energy where it matters. We value ethical collaborative relationships with our business partners and suppliers, and care deeply about the safety and wellbeing of our people, customers, communities, and environment. Contact Energy is also strongly committed to treating all people, both inside and outside the company, with dignity and respect.

We work to ensure that our operations are conducted in accordance with all regulatory compliance requirements, and we take a partnership approach with tangata whenua to manage whenua, awa and other taonga. We act with integrity and authenticity and make sound decisions knowing they'll be subject to scrutiny. We uphold and promote human rights within our areas of influence, engaging with stakeholders and communities on the development of solutions to issues that affect them.

We are now at the midpoint of our Contact26 strategy – the strategy to build a better Aotearoa New Zealand by leading the country's decarbonisation. This strategy is underpinned by our commitment to strong environmental, social and governance (ESG) practices, a focus on operational excellence and the ongoing transformation of how we work. While we recognise the limitations in fully uncovering and mitigating all potential modern slavery risks in complex supply chains, we are committed to continuous improvement in our efforts and approach.

This Statement is made jointly on behalf of Contact Energy Limited ("Contact") and its wholly owned subsidiary, Western Energy Services Ltd (Western). It reports on the assessment of modern slavery risks, the governance framework and activities to minimise modern slavery risks in all entities' operations for the twelve months ending 30 June 2024 ("FY24"). It has been approved by the Board of Contact Energy Limited.

## Executive Summary

Contact believes in touching lives, to make life better. We are committed to respecting human rights and to responsible procurement activities in partnership with our suppliers. In line with these commitments, we continue to work to improve our operations and those of our supply partners with the goal of identifying, preventing, and remediating modern slavery risks.

In FY24, we focussed on developing a better understanding of and improving visibility of our supply chains, strengthening our modern slavery governance framework and developing key relationships to better identify and address modern slavery issues. An independent third-party business assurance review of our approach helped us to identify areas for further development and recommended areas to grow our efforts. In FY24 we had no reported incidents of slavery or human trafficking. Modern slavery and human rights breaches can be difficult to detect. We are committed to improving our processes to better identify, address, and combat occurrences.

In FY25 we will start a regular series of risk-based, extended supply chain reviews, build on our supplier and supply chain management for better oversight, and expand modern slavery training for our people and stakeholders. In parallel, our new governance structure will help us to identify risks and embed our approach across the business.

These efforts will provide a better understanding of our own supply chains and lift our ability to identify, assess and mitigate any modern slavery risks that arise.

## 2. About Contact

### Our operations and supply chain

Contact is one of New Zealand's largest listed companies, generating electricity from hydro, geothermal and thermal fuel sources and supplying electricity, natural gas and LPG products. We also provide broadband and mobile services.

We own and operate ten power stations: the Taranaki Combined Cycle and Stratford Peaker Plants in Taranaki, Te Huka, Ohaaki, Poihipi, Wairakei and Te Mihi in Waikato, Whirinaki in Hawke's Bay, and Clyde and Roxburgh in Central Otago. This year we have two new power stations opening, with the completion of our \$1.2 billion investment to expand geothermal renewable energy portfolio in Taupō. In August, we confirmed a final investment decision to build our first solar farm at Christchurch Airport in partnership with Lightsource bp. This will comprise around 300,000 solar panels. Two further solar development projects (one with a large-scale grid-connected battery) are planned. In addition, we have lodged a resource consent application for a South Island wind farm development with up to 55 turbines. This, alongside our 100MW grid-scale battery in south Auckland currently under development, reflects our commitment to growing renewable development to help build a better New Zealand.

We purchase a wide variety of goods and services to help us maintain our power stations, support our customers, and run our offices. Our responsible procurement framework helps us identify and manage risks in our supply chain, including modern slavery, and allows us to work with suppliers to align their practices with our goals.

The goods and services we purchase include:

- + geothermal, hydro, and thermal power station supplies;
- + IT hardware and software;
- + vehicles;
- + safety equipment;
- + grid scale battery;
- + personal protective equipment/work wear;
- + metering field services;
- + facilities maintenance;
- + construction services, equipment and components; and
- + gas, electricity, and broadband services.

### Our workforce

Contact employs over 1,200 people based at 19 sites throughout New Zealand. While we have no overseas-based employees, from time to time our subsidiary Western deploys teams to deliver specialist well-cleaning services to domestic and international customers.

Please see our **FY24 Integrated Report** for more information about Contact's operations, and supply chain and workforce.

## Policy framework and governance

### Communicating our human rights expectations

We care deeply about the health, safety and wellbeing of our employees and expect all our people to act honestly, with integrity and in accordance with the law, all the time. This expectation is enshrined in our **Code of Conduct** which applies to everyone working for Contact, including our Board of Directors, and underpins our corporate policy framework.

Contact has a comprehensive set of policies and procedures that articulate our values, ways of working and expectations of our team and suppliers. These are reviewed regularly.

### Modern Slavery governance

In FY24 we established a Modern Slavery Working Group and integrated it into our reporting framework. The Working Group comprises representatives from our Major Projects, Solar, Wind and Battery teams as well as our Procurement, People Experience, Legal and Risk teams. It reports to the Procurement Steering Group, which comprises Senior Leadership Team members and the Head of Strategic Procurement. This structure ensures oversight and input on significant modern slavery issues at senior management level.

The Board Audit and Risk Committee (ARC) ensures that management has established a risk management framework in line with the Board's expectations which includes policies and procedures to effectively identify, treat and monitor principal risks, and regular reporting to the ARC and Board.

Policy	Purpose	Training
<b>Code of Conduct</b>	Sets out our expectations for how our people (including contractors) behave towards each other, our partners and our community.	Mandatory for all employees, on a regular cycle.
<b>Supplier Code of Conduct</b>	Sets out our expectations of suppliers, including those relating to human rights and modern slavery.	The Supplier Code of Conduct is provided to all suppliers and we will work towards including it in all supplier contracts.
<b>Human Rights</b>	Outlines our commitment to observing all human rights laws and to mitigate, identify and remediate modern slavery risks including to prohibit the use of all forms of forced and compulsory labour, all modern forms of slavery and any form of human trafficking in our operations and supply chain.	Our Code of Conduct compliance training for all employees includes human rights elements relating to bullying and harassment.
<b>Health and Safety</b>	Outlines our commitment to healthy and safe ways of working that protect our customers, team members and business partners.	Mandatory for all employees, on a regular cycle.
<b>Whistleblowing</b>	Sets out the processes for reporting suspected serious wrongdoing.	Component of regular Code of Conduct training.

Our **Corporate Governance Statement** outlines how our key policies operate, and the policies are on our **website**.

# 3. Risks of modern slavery practices in our operations and supply chain

The risk of Modern Slavery occurring in our operations is low, as most of our people are employed directly (or are directly contracted) and are based in New Zealand. New Zealand is ranked eighth in the Global Slavery Index.

We comply with all relevant domestic and international labour laws. All our employees have freedom of association and the right to collective bargaining. Accordingly, our operational risk assessment focusses on areas of the business that use contracted or third-party labour providers. We have less direct visibility and control over these providers and their employment terms.

We also rely on extensive and complex global supply chains, where risks can be higher. Our risk profile for FY24 was also slightly higher than for FY23 due to our greater involvement in renewables projects. During the year we increased our focus on identifying, managing, and mitigating the risks of modern slavery in our business and supply chain.

Contact's subsidiary Western does some international work in countries which rank higher in the Global Slavery Index. In this context it is engaged as a consultant/supplier of specialist services for a project. While this can make it more challenging for Western to assess the extent to which local laws – including modern slavery laws – are being enforced, we expect our partners to meet the expectations set out in our Supplier Code of Conduct. This includes an expectation that working conditions are safe and that workers are treated in a responsible way, with respect and dignity.

We continue to work with Western to raise awareness of modern slavery issues so that it can identify and potentially act on an issue where necessary.

Our work to make responsible business practices a core element of our practices was recognised in our Dow Jones Sustainability™ Asia Pacific Index (DJSI Asia-Pacific) result in FY23, when we achieved the highest ranking in New Zealand. The DJSI assesses a range of corporate economic, environmental and social issues including labour practices.

## Modern slavery risk assessment

As our most significant modern slavery exposure risk is our indirect links through supplier relationships, we focussed our efforts on this area during the reporting period. We identified a set of supplier risk indicators to inform our assessment process (see table below). We applied these indicators to over 1,500 suppliers and identified around 300 which fell into one or more risk categories. We carried out a desktop review of these higher-risk suppliers to:

- + check each supplier against international lists (maintained by NGOs, trade organisations and others); and
- + run negative media searches to identify whether any allegations have been made or reported in relation to each supplier.

This review identified no modern slavery issues or red flags.

We acknowledge the complexity of detecting modern slavery, particularly in a desktop review where we rely on online tools and media reports. We aim to strengthen supplier relationships, improve oversight of the onboarding and management process, and conduct a more targeted due diligence in higher-risk parts of our supply chain to identify and mitigate these risks more effectively.

The four indicators and key risk areas identified in our desktop review are set out below:

## Risk indicators

### Vulnerable populations



Groups of people more likely to be exposed to harm, or unable to advocate for themselves in exploitative situations. We recognise that the level of worker vulnerability, and risk of poor labour practices and exploitation are higher in contexts where base skill labour is relied upon.

### High risk business models



Business models that rely on third parties for the provision of services e.g. labour hire.) Outsourcing reduces the visibility of third-party recruitment practices and provision of worker entitlements.

### High risk industries



Products and services regarded as having more significant inherent modern slavery risk (e.g. solar panels).

### High risk geographies



Countries or regions which are known to have higher human rights (and modern slavery) risks, including those vulnerable to bribery and corruption, or without strong labour laws and governance.

## Key risk areas

### Engagement of labour via third parties

Contact engages labour for major project sites via third parties. There is likely to be a high prevalence of migrant labour, particularly during periods of peak demand. Contact has less visibility and oversight of these workers, especially where sites are remote. The risks of forced labour and other modern slavery practices may be higher in these circumstances.



### Joint ventures

Acquisitions, investments in, or partnerships with, other organisations can expose Contact to high-risk business models, vulnerable populations, or high-risk geographies.



### Western offshore projects

Western operates in some regions at higher risk of modern slavery, though it does not have direct control or oversight of other workers when it provides specialist services.



### Solar supply chain

The solar panel supply chain carries a high risk of modern slavery (and other human rights) abuses. Solar grade polysilicon – derived from mined quartz – is the key raw material in the solar supply chain. It is used to produce photovoltaic wafers and ingots, which ultimately become solar panels and cells. It is estimated that 45 percent of the global solar panel polysilicon supply comes from Xinjiang, where Uyghurs subject to forced labour conditions are involved in its production, and that China produces more than 75% of the world's solar products. Research indicates that all four of Xinjiang's polysilicon manufacturers have reported their participation in labour transfer programmes and/or are supplied raw materials to companies that have. China's dominance in global polysilicon production and solar product supply chains puts solar panels, as well as other silica-based products like semiconductors, at high risk for modern slavery. In 2021 the US Bureau of Labour added polysilicon to the list of items "produced by forced labour by Muslim minorities in China".



### Wind supply chain

The growing demand for balsa wood used in wind turbines has resulted in the exploitation of workers in the balsa industry in Ecuador and the use of forced labour in the Amazon. Modern wind turbine designs are increasingly moving away from using balsa wood in the blades with alternative materials such as PET being used in their manufacture.



There are also modern slavery risks associated with the minerals used in wind turbine manufacture, including copper and manganese.

### Battery supply chain

The procurement of batteries is considered high-risk for modern slavery due to risks present throughout the supply chain. Key resources used for batteries (e.g. lithium, cobalt) may be sourced from regions associated with human rights abuses. Around 15% to 30% of the cobalt used in lithium batteries (in which solar energy is stored) is sourced from mines in the Democratic Republic of the Congo – where forced and child labour is common.



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**Sourcing of electronic goods (e.g. laptops, mobiles)**

Electronics manufacturing is a high-risk industry for modern slavery due to the typically low profit margins and tiered production system. Manufacturing often takes place in less developed countries with minimal legal and regulatory protections, resulting in a higher risk of modern slavery. The raw materials are often sourced from high-risk geographies, meaning that there are also more risks in the electronics supply chain.



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**Cleaning, Maintenance and Security Services**

These categories of work can be high risk due to remote work locations, manual labour, on-demand work and reduced visibility of subcontracting arrangements.





# 4. Actions to address identified risks

We take a risk-based approach in prioritising the areas for further action. This section sets out our progress against the objectives set out in our FY24 Modern Slavery Statement, together with additional initiatives undertaken, and our plans for F25.

KEY






COMPLETE









ONGOING

Objectives	Status	Activities
<p><b>Continue to embed our modern slavery approach across the business during FY24 and further integrate it with our suite of ESG strategies</b></p>		<p><b>FY24</b></p> <ul style="list-style-type: none"> <li>• Began to implement modern slavery approach into business processes and focused on training, awareness-raising and supplier screening.</li> <li>• Our Head of Procurement released a podcast to all employees in early 2024 in which she discussed the risks of modern slavery and raised awareness of the actions employees could take if they had any concerns.</li> <li>• Established a Modern Slavery Working Group, comprising representatives from key business areas, which reports to the Procurement Steering Group.</li> </ul> <p><b>Modern Slavery Working Group responsibilities:</b></p> <ul style="list-style-type: none"> <li>• Identify any modern slavery issues or concerns in members' respective business areas;</li> <li>• Identify resulting actions, mitigations or further steps required;</li> <li>• Monitor implementation of approaches to modern slavery;</li> <li>• Identify modern slavery training requirements or opportunities for Contact people or suppliers; and</li> <li>• Escalate issues and related recommendations to the Procurement Steering Group, as necessary.</li> </ul> <ul style="list-style-type: none"> <li>• Continued to communicate with Western about modern slavery issues they may encounter.</li> </ul> <p><b>FY25</b></p> <ul style="list-style-type: none"> <li>• Use Modern Slavery Working Group to gather information, identify and fulfil training needs, and improve and cement our modern slavery approach across the business by ensuring consistent application of procurement processes and strong supplier relationship management.</li> <li>• Agree an escalation process for any modern slavery issues identified and set KPIs to track progress.</li> </ul>
<p><b>Work closely with our project partners to ensure a robust approach to identifying, assessing and mitigating modern slavery risks</b></p>		<p><b>FY24</b></p> <ul style="list-style-type: none"> <li>• Began conversations with teams sourcing products and services for renewables projects and reviewed partners/potential partners' modern slavery approaches.</li> <li>• Explicitly referenced modern slavery considerations in major investment and procurement decisions.</li> </ul> <p><b>FY25</b></p> <ul style="list-style-type: none"> <li>• Carry out two extended supply chain reviews for product or service categories identified as having higher potential for worker exploitation. Improve visibility by reaching deeper into these supply chains via tier 1 suppliers into tiers 2, 3 and beyond. Repeat these extended reviews for different product/service categories each financial year.</li> <li>• Strengthen key supplier relationships through a series of one-to-one discussions, including on modern slavery approaches.</li> </ul>

Objectives	Status	Activities
<p><b>Our updated procurement system, once implemented, will strengthen our ability to screen suppliers and provide reassurance that they meet our expectations around Modern Slavery standards</b></p>		<p><b>FY24</b></p> <ul style="list-style-type: none"> <li>• Implemented a new procurement policy and framework to drive more procurement work through the central team, ensuring tighter oversight of supplier onboarding.</li> <li>• Designed a three-step risk approach for all new suppliers, to be applied in FY25:               <ul style="list-style-type: none"> <li>– conduct a base set of due diligence activity</li> <li>– apply key risk indicators to rule out other concerns; and</li> <li>– audit higher-risk suppliers.</li> </ul> </li> <li>• Refreshed our Supplier Code of Conduct.</li> <li>• Developed closer relationships between the Procurement team and the Legal, Compliance, Communications and Risk teams to drive a more comprehensive approach to risk identification and resolution.</li> <li>• Analysed and categorised vendors to build supplier risk profiles so we can make sure we’re making informed, risk-based decisions.</li> <li>• Created a dedicated “responsible procurement” email for suppliers to contact us with any concerns, including those relating to modern slavery.</li> </ul> <p><b>FY25</b></p> <ul style="list-style-type: none"> <li>• Complete implementation of supplier onboarding and management process.</li> <li>• Carry out two extended supply chain reviews for product or service categories identified as having higher potential for worker exploitation. Improve visibility by reaching deeper into these supply chains via tier 1 suppliers into tiers 2, 3 and beyond.</li> <li>• Incorporate modern slavery clauses in all relevant supplier and service provider contracts.</li> <li>• Require suppliers and service providers to adopt any measures necessary to minimise the risk of forced labour and any form of modern slavery within their organisation, as well as promote the adoption within their supply chain. Where non-compliance is identified, our approach is to partner with primary suppliers to remedy breaches and provide an appropriate outcome for affected workers. However, if the non-compliance is sufficiently serious or the supplier does not cooperate in remediation, we may consider ending our relationship with that supplier.</li> <li>• In Q1, begin face-to-face discussions with existing suppliers to build closer relationships, starting with our highest-spend suppliers. These discussions will include coverage of modern slavery approaches and seek to understand what steps suppliers are taking to tackle it.</li> </ul>
<p><b>Expand our in-person modern slavery training to selected business units</b></p>		<p><b>FY24</b></p> <ul style="list-style-type: none"> <li>• Delivered bespoke training to key business units identified as being at higher risk of encountering modern slavery issues (in particular, the Major Projects and Development teams.)</li> </ul> <p><b>FY25</b></p> <ul style="list-style-type: none"> <li>• Identify additional business areas for training and deliver appropriate training.</li> <li>• In Q1, run a series of ‘drop in’ sessions for all Contact people on the new procurement policy and framework. These sessions will include a modern slavery component to raise awareness of modern slavery ‘red flags’ and Contact’s approach.</li> </ul>
<p><b>New Code of Conduct online training for all Contact people being developed in early FY24 will include a human rights component, helping to raise awareness across the business</b></p>		<p><b>FY24</b></p> <ul style="list-style-type: none"> <li>• Designed and rolled out new Code of Conduct compliance training for all employees, including human rights elements relating to bullying and harassment. The training also points employees to Contact’s whistleblowing channel for reporting this type of behaviour.</li> </ul> <p><b>FY25</b></p> <ul style="list-style-type: none"> <li>• Continue to raise employee and partner awareness through targeted modern slavery training and communications programmes.</li> <li>• Develop a modern slavery training module available to all employees.</li> </ul>

## Additional activities

Objectives	Status	Activities
<b>Raising profile of whistleblowing channel</b>		<p><b>FY24</b></p> <ul style="list-style-type: none"> <li>Introduced two-monthly reminders to all employees about our whistleblowing channel for any modern slavery concerns.</li> </ul>
<b>Kōwhai Park joint venture modern slavery review</b>		<p><b>FY24</b></p> <ul style="list-style-type: none"> <li>Contact Energy and Lightsource bp (LSbp) have entered a 50:50 joint venture to construct a solar farm at Christchurch Airport. Our first grid-scale solar farm, Kōwhai Park will support demand for renewable energy and the decarbonisation of our portfolio. LSbp is an experienced global solar developer with a robust approach to modern slavery risk in its supply chain. Its global procurement team maintains industry leading Human Rights policies, ESG reporting and supply chain risk mapping standards. Given their strong capability and industry leading standards in modern slavery and sustainability reporting, LSbp has taken the lead on these audits for Kōwhai Park on behalf of the joint venture.</li> <li>None of these audits identified modern slavery concerns, and none of the suppliers is 'red flagged' in international lists as having links to forced labour. The audits gave us a high degree of confidence that our solar panel supply chain has been well-audited for modern slavery risk. However, we are aware that the solar supply chain carries an inherently high risk of modern slavery abuses and that continued investigations and vigilance will be necessary.</li> </ul>
<b>Supply chain risk identification</b>		<p><b>FY24</b></p> <ul style="list-style-type: none"> <li>Cross-referenced our key risk areas with our supplier base, also considering Contact's spend with each one, to produce a list of suppliers for further investigation. We used a range of online modern slavery tools – together with a 'negative media' review – to investigate our highest-risk suppliers in each area. We also investigated their own supply chains to the extent that information was publicly available.</li> <li>Our in-depth review of the "higher risk" suppliers did not identify any modern slavery issues of concern.</li> </ul>
<b>Battery project risk identification</b>		<p><b>FY24</b></p> <ul style="list-style-type: none"> <li>Contact Energy recently confirmed we will build a grid-scale battery as part of our investment in renewable energy flexibility. We are partnering with Tesla to build a 100-megawatt battery energy storage system (BESS).</li> <li>The BESS industry faces challenges in ESG performance due to a heavy reliance on component manufacturing limited to particular geographic regions. Lithium and cobalt are both critical battery components, but their mining and processing often involves labour abuses and ethical malpractices.</li> <li>As part of our due diligence during the tendering process we reviewed Tesla's modern slavery approach. Tesla has a stringent procurement auditing process. Its Responsible Sourcing Policies outline a robust approach to forced labour, modern slavery, and human trafficking. It has published a Modern Slavery Transparency Statement which sets out mitigating steps it has taken around its sourcing of raw materials for batteries. It also meets Contact Energy's Supplier Code of Conduct expectations and is taking a range of actions to address modern slavery in its supply chain. Tesla acknowledges that there are modern slavery risks in the global battery supply chain and is transparent about the challenges and the mitigations it applies. Contact Energy will continue to work closely with the supplier to identify and address any modern slavery risks.</li> </ul>
<b>Wind project risk identification</b>		<p><b>FY24</b></p> <p>Contact Energy is developing a pipeline of wind farm opportunities to meet Aotearoa New Zealand's growing demand for renewable electricity. As part of our due diligence into prospective suppliers we will be reviewing their ESG (including modern slavery) documentation and processes. Wind turbine supply chains can include some suppliers based in regions where controls and oversight are weaker, and the prevalence of modern slavery higher. If we do proceed with any of these higher-risk suppliers, we will increase the level of due diligence undertaken.</p>

Objectives	Status	Activities
<p><b>Survey of third-party labour hire</b></p>		<p><b>FY24</b></p> <p>We identified 32 third party labour hire suppliers at our Wairakei site and asked each to complete a detailed modern slavery questionnaire that was tailored for this sector. Sixty-nine percent of suppliers responded in the requested time frame. The questionnaire asked a range of questions about suppliers' modern slavery governance, policies and compliance, relationships with subcontractors and training provision for employees. We reviewed all responses and related documentation, 'red-flagging' any supplier which did not provide satisfactory answers. We followed up with those suppliers individually to discuss the gaps in their responses and seek to understand the basis for them. We made clear our expectation that these gaps would be closed and offered to work with them to achieve consistency with our Supplier Code of Conduct expectations. This exercise gave us significant insights into the way our direct suppliers are managing their own supply chains and identified areas where further collaboration is needed. We expect that it will both help increase our visibility of this segment of our supply chain and help some suppliers to better-understand and meet our expectations around modern slavery approaches."</p>

# 5. Effectiveness of our Actions

We recognise that the effort to identify and address modern slavery risks throughout our supply chain is a continuous and evolving process. We believe that the steps we have taken during FY24 to review and improve our actions have significantly strengthened our approach, as follows:

- + We have a better understanding of the risks in our key supply chains of solar, wind and batteries.
- + We have more information about the modern slavery approach of 22 of our suppliers' and identified four suppliers for follow-up. We are currently conducting those follow-ups to determine whether there are areas we can work on with the supplier to help strengthen their approach. If those suppliers are not able to meet our expectations in a reasonable timeframe, we may consider ending the relationship. Our risk analysis and desktop review of around 300 suppliers provided some reassurance that there were no obvious modern slavery issues in this group (although we are aware that a desktop review cannot provide full supply chain visibility and we intend to deepen and extend our reviews over time).
- + The delivery of training to key business teams has raised awareness of modern slavery and generated further interest in best practice in this area.
- + Establishing an improved governance framework through the Modern Slavery Working Group and Procurement Steering Group has given us "eyes and ears" across the business, and an agreed process for review and escalation of modern slavery issues.
- + The new Procurement policy and framework have set us up for better oversight of, and relationships with, our suppliers.

## Independent modern slavery review

In March 2024 Contact Energy engaged external consultants to review our business-wide approach to modern slavery and worker exploitation. The objective was to provide assurance that our controls, processes and plans – including supplier management – will lead to improved compliance and to identify areas for improvement. The consultants conducted a maturity assessment across five dimensions: strategy and awareness, policies and procedures, operations and working conditions, governance and oversight, and reporting and transparency. The review included interviews with Contact and Western personnel, coupled with a desktop review, to assess Contact's current maturity and compliance levels in relation to modern slavery and worker exploitation practices. The report recognised the work being done to strengthen our modern slavery approach but identified several opportunities to better-integrate that approach across the business and reduce risks.

It is a useful roadmap that has helped us focus on high-risk areas and high impact actions. Work is underway to implement the recommendations, and several have already been actioned.

## Ongoing assessment

We will assess the effectiveness of our modern slavery risk management in accordance with our Corporate Governance framework, on an ongoing basis. The framework provides an informed and independent view of whether risk-based controls are in place and working as intended.

As noted earlier in this Statement, we are aware that these efforts are necessary but not sufficient to uncover and address all potential modern slavery risks across complex global energy sector supply chains. We anticipate that our planned focus – including on closer supplier relationships, greater supply chain monitoring and 'deep dive' investigations – will raise transparency levels and increase the likelihood of us uncovering potential modern slavery issues.

In FY25 we will develop a set of quantitative key performance indicators that can be measured to assess the effectiveness of our modern slavery programme over time. The achievement of the targets will be subject to independent review by the Risk & Business Assurance team. This will help us to improve data quality and reliability.

# 6. Consultation and Approval Process

Consultation on the content of this Modern Slavery Statement included engagement with:

- + Western
- + The Modern Slavery Working Group and Procurement Steering Group
- + Contact's Commercial and Procurement Specialists
- + Business unit representatives with oversight of suppliers and subsidiaries assessed as potentially more exposed to risks of Modern Slavery practices
- + Senior managers from the Legal, Commercial, Risk & Assurance and Procurement teams
- + Contact's Senior Leadership Team.

This Statement was approved by the Board on 16 August 2024.



**Rob McDonald**  
Board Chair  
Contact Energy Limited



**Mike Fuge**  
Chief Executive Officer  
Contact Energy Limited

# 7. Other relevant information

## Collective action initiatives

We see great value in the role of collective action initiatives, including through sectoral, cross-sectoral and multistakeholder initiatives. During the reporting period we continued to participate in Collaborative Advantage, a cross-industry group which meets monthly to discuss and share best practice in human rights compliance, with a focus on modern slavery. We have also maintained a relationship with a large Australian energy sector participant to share our progress and exchange best practice information on approaches to eradicating modern slavery.

## Whistleblowing

We have a “ReportIt!” site where all employees can make anonymous or non-anonymous reports about behaviour, activity, or information that breaches our Code of Conduct, policies or legal obligations, or that someone is not comfortable with. The site encourages people to be alert to modern slavery and to report it if they see or suspect it anywhere in our business or supply chain. We recognise that speaking up takes courage, and remind our colleagues of the wellbeing support available to them to support them in this process, for example, our Clearhead Employee Assistance Programme.